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## APPLICATION

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Honorable Felix J. Boudreaux  
Commissioner of Conservation  
P.O., Box 94275  
Baton Rouge, LA 70804-9275

RE: 13,800' Zone, Reservoir C  
Bourgeois Sand, Reservoir A  
Rousseau Field  
Lafourche Parish, Louisiana

Dear Commissioner Boudreaux:

Application is hereby made on behalf of **POGO PRODUCING COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters in the **13,800' Zone, Reservoir C, and Bourgeois Sand, Reservoir A**, both in the Rousseau Field, Lafourche Parish, Louisiana, to-wit:

1. To establish rules and regulations and create a single drilling and production unit for each of said reservoirs for the exploration for and production of gas and condensate, such units to be designated 13800 RC SUA and BOURGEOIS RA SUA, respectfully;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each the proposed units, with each tract sharing in unit production on a surface acreage basis of participation;
3. To designate the Pogo Producing Co. - Kearns No. 3 Well as the unit well for each of the proposed units;

4. To designate Pogo Producing Company as the unit operator for each of the proposed units;
5. To provide that the Commissioner of Conservation should be authorized to reclassify each of the reservoirs by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation; and
6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The 13,800' Zone in the Rousseau Field, Lafourche Parish, Louisiana, was previously defined in Office of Conservation Order No. 343-CC, effective July 17, 2001.

The Bourgeois Sand, was previously defined in the Thibodeaux Field in Order No. 326-E-2, effective July 15, 1980, and the Bourgeois Sand, Reservoir A in the Rousseau Field is hereby defined as that certain sand encountered between the depths of 12,210 feet and 12,318 feet, electric log measurements, in the Pogo Producing Co. - Kearns No. 3 Well, located in Section 67, Township 15 South, Range 17 East, Lafourche Parish, Louisiana.

A conference to discuss the proposed application and any opposition thereto was held at 10:30 a.m., on Friday, May 3, 2002, at The Onebane Firm, 102 Versailles Blvd., Suite 600, Lafayette, Louisiana 70502, (337) 237-2660. A list of the parties who attended the pre-application conference is attached. Randall C. Songy, attorney for the applicant, opened the conference with a brief discussion of the Rules of Procedures. David Comeaux, geological consultant for the applicant, explained the applicant's proposal and the geological, engineering and other bases therefor, and answered questions. Separate counterplans for the 13,800' Zone were presented by Paul Perret on behalf of Laurel Valley Plantation and Bill Clay on behalf of Mary Francis Naquin, and other parties present also suggested they were considering counterplans. No counterplans were submitted for the Bourgeois Sand. There was an attempt to resolve the differences between the parties, which could not be completed at the conference. The conference was then adjourned.

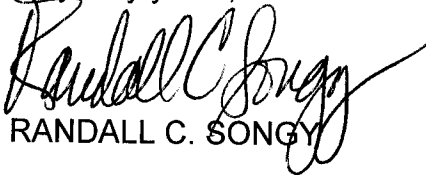
Subsequent to the conference, additional discussions were held, which have resulted in a compromise unit proposal for the 13,800' Zone which is attached to this Application and which is supported by a large majority of the conference attendees, including 100 percent of the working interest. However, we were not able to get unanimous consent and we do expect one counterplan to be filed.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting David Comeaux at Leon Comeaux & Associates, 305 La Rue France, Lafayette, Louisiana 70508, (337) 233-9839.

There is attached hereto and made a part hereof plats outlining the proposed units and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties and Request for Waiver are being furnished ONLY to the Commissioner of Conservation and to the District manager of the Lafayette District of the Office of Conservation. However, the list of parties and Request for Waiver will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$1400.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,



RANDALL C. SONGY

RCS/dde/bad  
Enclosures

cc: Mr. Richard Hudson, District Manager  
Office of Conservation

All Interested Owners, Interested Parties  
and Represented Parties

**P.S. To all Interested Owners, Represented Parties and Interested Parties:**

You may have received this Application even though your property is not included in the proposed unit, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed units. In some cases, the area proximate to proposed units can extend as far as one-half mile outside the unit boundary.

Your receipt of this Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.



